

PSJ11 CVS Opp Exh 28

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4

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7 IN RE:

8 NATIONAL PRESCRIPTION OPIATE MDL NO. 2804

LITIGATION

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This document relates to: Case No. 17-MD-2804

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All cases Hon. Dan A. Polster

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12 HIGHLY CONFIDENTIAL - SUBJECT
13 TO FURTHER CONFIDENTIALITY REVIEW

14 VIDEOTAPED DEPOSITION OF:

15 RONALD LINK

16 MOTLEY RICE

17 55 Cedar Street

18 Providence, Rhode Island

19 December 11, 2018 9:09 a.m.

20

21

22 Darlene M. Coppola

23 Registered Merit Reporter

24 Certified Realtime Reporter

1 MR. BAKER: Yeah. Bates Number
2 30750.

3 VOICE: What --

4 MR. BAKER: Whoever that is, I'm
5 going to say the Bates number from now on, but
6 it's 30750.

7 BY MR. BAKER:

8 Q. Could you go to exhibit --

9 VOICE: So --

10 MR. BAKER: 30750. Thank you.

11 BY MR. BAKER:

12 Q. Let me show you Exhibit No. 50.

13

14 (Exhibit No. 50 marked for
15 identification.)

16

17 BY MR. BAKER:

18 Q. This is a document entitled "Wholesale
19 Supply Agreement, July 1, 2009." Do you see
20 that? Between Cardinal Health and CVS, Inc.

21 Do you see that in the first
22 paragraph?

23 A. I do.

24 Q. The Bates number on this is 30817,

1 correct? At the bottom?

2 A. Correct. Correct.

3 Q. And this is dated July 1, 2009,

4 correct?

5 A. Correct.

6 Q. All right. And you see on page 30840

7 in that agreement, but I'll show it to you

8 right here -- do you see on page 30817 in that

9 agreement that it is signed by CVS Pharmacy,

10 Inc., 7/1/2009?

11 Do you see that?

12 A. I do.

13 Q. This is signed by CVS Pharmacy

14 Purchasing and Pharmaceutical Relations,

15 correct?

16 A. Correct.

17 Q. Is that who does the purchasing of

18 these outside vendor supply --

19 A. Yes.

20 Q. -- of narcotics to CVS pharmacies?

21 A. Yes.

22 Q. And you're not made aware of that when

23 these purchases are going on, correct?

24 A. Correct.

1 Q. And so you really have no idea during
2 the period of time that you were in charge of
3 the suspicious order monitoring program and
4 logistics just the extent to which these
5 outside vendors were providing narcotics to
6 CVS pharmacies; is that correct?

7 A. That is correct.

8 MR. BAKER: Let me show you
9 Exhibit 51.

10
11 (Exhibit No. 51 marked for
12 identification.)

13
14 BY MR. BAKER:

15 Q. Exhibit 51 is two pages. The first
16 page is Bates 30892. The second page is Bates
17 30995.

18 Do you see that?

19 A. I do.

20 Q. Okay. This is a wholesale supply
21 agreement between CVS and Cardinal -- the
22 first page, or the first page of a wholesale
23 supply agreement between CVS and Cardinal
24 dated January 1, 2004, correct?